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**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

AGUDATH ISRAEL OF AMERICA, a New
York non-profit corporation, and WR PROPERTY
LLC, a New Jersey limited liability company,

Plaintiffs,

v.

TOWNSHIP OF JACKSON, NEW JERSEY,
MICHAEL REINA, ROBERT NIXON, HELENE
SCHLEGEL, JEFFREY PURPURO, WILLIAM
CAMPBELL, and KENNETH PIESLAK,

Defendants.

Civ. No. 3:17-DV-03226

DECLARATION OF RACHEL BRUDNY

RACHEL BRUDNY declares as follows, pursuant to 28 U.S.C. § 1746:


1. I live at 127 Valley Road in Jackson Township, New Jersey.
2. I submit this declaration in support of Plaintiffs' motion for a preliminary injunction.
3. I am a member of Agudath Israel.
4. My religious beliefs prohibit me from pushing a stroller or a wheelchair or carrying food, medication, canes, water bottles, house keys, personal identification, books, prayer shawls and/or reading glasses outside of my home on the Sabbath and on holy days, unless there is an *eruv*, an area enclosed by a wire boundary that symbolically extends the private domain of Jewish households into public areas.
5. There is no *eruv* in my neighborhood and Jackson has passed an ordinance prohibiting the installation of an *eruv*.
6. The lack of an *eruv* hampers my ability to practice my religious beliefs in multiple ways, including:
 - a. It is my religious belief that my children, who are ages 5 ½, 4, and 2 should go to shul for a portion of the day on shabbos and on holy days. Because there is no *eruv*, I am unable to take them to shul because my 2 year old cannot yet walk the distance to the shul. Our shul is at least a ten minute walk and includes crossing a major road. My son must go in a stroller or be carried. Because my husband or I cannot push a stroller or carry my son without an *eruv*, we are unable to bring him to shul.
 - b. I believe that it is important to attend worship services at shul on shabbos and on the holy days. However, because there is no *eruv*, I cannot carry or push my 2

year old in a stroller, either my husband or I must stay home from shul and cannot participate in worship services at shul.

- c. It is my religious belief that we must pass our traditions on to our children, *l'dor vador* (from generation to generation) and that my children should learn from older family members. However, I cannot have my elderly grandparents come for shabbos because they cannot be pushed in a wheelchair or use a walker to attend shabbos services.
 - d. Similarly, my husband's grandmother, who is 96, used to come to our house for shabbos and holy days. She is no longer able to travel without a wheelchair and because there is no *eruv*, she cannot come anymore. My children are missing out on vital intergenerational learning.
 - e. Nor can we visit my brother-in-law, who lives a ½ mile away, for a shabbos or holy day meal or celebration because there is no *eruv* and we cannot push my son in a stroller or carry him on the sabbath and on holy days.
7. The ordinances prohibiting an *eruv* do not affect my neighbors who are not Orthodox Jews because they are permitted to push strollers and travel to their houses of worship and families with or without an *eruv*. The prohibition on the *eruv* only affects Orthodox Jews.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on August __, 2019



RACHEL BRUDNY